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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON

UNITED STATES OF AMERICA,)	No. 3:22-cr-00084-SI
)	
Plaintiff,)	UNOPPOSED MOTION TO AMEND
)	PROTECTIVE ORDER
)	
vs.)	
)	
TONY KLEIN)	
)	
Defendant.)	

Defendant Tony Klein, through his attorney Matthew G. McHenry,
moves modify the Protective Order applicable to this case (ECF No. 11) as
set forth below. The government does not object to this motion.

The current protective order contains the following provision:

[C]ounsel for defendant shall not provide defendant with any
copies of any discovery material produced by the government
which contain:

Personal Information: personal identifying information of any
individual, including without limitation, any individual's date
of birth, social security number, address, telephone number,
email address, driver's license number, professional license
number, family member's names, or medical information,
including mental health or substance abuse information;

ECF No. 11 at 1.

The parties have conferred regarding discovery production and review. The defendant and government agree that the Protective Order should be amended to remove the phrase “family member’s names, or medical information, including mental health or substance abuse information” from the section quoted above.

In addition, the parties agree that the following should be inserted at the end of the Protective order:

“IT IS FURTHER ORDERED that while defendant is allowed to view discovery containing personal information regarding family member’s names, or medical information, including mental health or substance abuse information, defendant shall not print or make copies, digital or otherwise, of such information.

IT IS FURTHER ORDERED that defendant shall not contact any known family members of any complaining witnesses referenced in the indictment or identified by the United States Attorney’s Office.”

Respectfully Submitted this 9th day of August, 2022:

/s/ Matthew G. McHenry
Matthew G. McHenry
Counsel for Tony Klein